From: Jones, Russell [Jones.Russell@epa.gov]

**Sent**: 5/16/2018 4:00:37 PM

To: McNally, Robert [Mcnally.Robert@epa.gov]; Leahy, John [Leahy.John@epa.gov]; Overstreet, Anne

[overstreet.anne@epa.gov]

**CC**: Yarger, Ryne [Yarger.Ryne@epa.gov]

Subject: FW: Plant Biostimulant Guidance- INTERNAL EPA REVIEW ONLY- Need Comments by 4/5/10

Attachments: Guidance for Plant Biostimulant Label Claims Update of 03 06 2018 CleanCopy V2.doc; image001.jpg;

image002.jpg

Importance: High

To All:

Please see email from Chad Schulze in Region 10 regarding the Guidance

Please advise on how to handle this.

Russ

\_\_\_\_\_

From: Schulze, Chad

Sent: Wednesday, May 16, 2018 11:37 AM

To: Jones, Russell

Subject: FW: Plant Biostimulant Guidance- INTERNAL EPA REVIEW ONLY- Need Comments by 4/5/10

Hi Russ!

Hey, I was using your incredibly helpful Guidance doc on Plant Biostimulants (again) and just notice Table 3 (Plant Regulator Active Ingredients) did not make it in the final draft ... This table has been very helpful and, for what it's worth, Region 10 would like to see it in the Final.

Table 3. Plant Regulator Active Ingredients Contained in EPA-Registered Products Having Modes of Action that Trigger Regulation Under FIFRA as a Pesticide 1, 2, 3

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* Abscisic Acid (ABA)
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\* gamma-Aminobutyric Acid (GABA)

\* 6-Benzyladenine (6-aminopurine; a cytokinin)

\* Chitin and Chitosan 4

\* Choline

\* Complex Polymeric Polyhydroxy Acids (including Humic acid, fulvic acid, tannins; & organic acids from Leonardite) 5

\* Corn glutens/Corn gluten meal

\* Cytokinins (as all isopentenyladenine and zeatin derivatives) 6

\* Cytokinin (as kinetin)

\* Ethylene

\* Gibberellic Acid A3 (GA3)

\* Gibberellic Acid A4/ A7 (GA4+7)

\* L-Glutamic Acid

\* Harpin proteins 4
\* Homobrassinolide

\* Homobrassinolide

\* Indole-3 Acetic Acid (IAA)

\* Indole-3-Butyric Acid (IBA)

\* Jasmonates (includes all dérivatives of jasmonic acid) 4

\* Lysophosphatidylethanolamine (LPE)

\* Láminarin

\* 1-Octanol

\* Potassium silicate 4

\* Saccharomyces cerevisiae extract (Brewer's Yeast extract) 4

\* Salicylic Acid 4

Seaweed Extracts 7

\* Sodium o-nitrophenolate

Sodium p-nitrophenolate

\* Sodium guaiacolate

1 Some EPA-registered microbial pesticides are registered as plant regulators or have plant regulator claims listed

on their product labels

```
Includes Biochemical and Microbial Induced Resistance Promoters
   This list only includes naturally-occurring plant regulators contained in EPA-registered
    products; it does not include substances under review by the Agency or known plant regulators for
    products have been proposed, but that may have plant regulator activity
   EPA-registered Induced Resistance Promoter
  Foliar applications only, soil applications may be excluded as a soil amendment in the absence of any
    claims (including plant regulator claims)
    Isopentenyladenine derivatives are typically produced by microbes; zeatin derivatives are typically
produced by
    plants
    Seaweed extracts (SWE) are heterogenous mixtures of naturally-occurring plant regulators
(Battacharyya et. al.
    2015; Craigle, 2011; Stirk and Tarkowska, 2003; Stirk et. al., 2014); products containing active
inaredients
    derived from SWE have been registered by the Agency as plant regulator products (see Appendix II)
Sorry for the late comment but since I haven't seen the final guidance, I thought I'd send this to you.
Thanks!
Sincerely,
Chad
Chad Schulze
Pesticide Enforcement Team Lead
Pesticide and Toxics Unit
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Like us on Facebook! http://www.facebook.com/EPADivers
From: Hopkins, Yvette
Sent: Thursday, March 15, 2018 8:12 AM
To: FIFRA Regional Supervisors <FIFRA_Regional_Supervisors@epa.gov>; FIFRA Regional Contacts
<FIFRA_Regional_Contacts@epa.gov>
Cc: Jones, Russell <Jones.Russell@epa.gov>; McNally, Robert <Mcnally.Robert@epa.gov>
Subject: Plant Biostimulant Guidance- INTERNAL EPA REVIEW ONLY- Need Comments by 4/5/10
Colleagues.
Attached is the most recent version of the Plant Biostimulant Guidance from BPPD. Please provide your
responses to Russel Jones by Thursday, April, 5, 2018, and please do NOT share with our co-regulators or others. Russ's contact information is below if you have additional questions.
Yvette
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